

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1**

PYFER LAW GROUP, LLC  
Scott C. Pyfer, Esq.  
20 Commerce Drive, Suite 135  
Cranford, New Jersey 07016  
Telephone: (908) 543-4025  
Facsimile: (908) 264-0721  
E-Mail: scott@pyferlawgroup.com  
Attorneys for the Debtor

In re:

OLIVERA BEVANDA,

Debtor.

Case No. 19-25165 (VFP)

Chapter 13

Hearing Date: February 20, 2020  
at 10 AM

**CERTIFICATION OPPOSING TRUSTEE'S MOTION FOR DISMISSAL OF THIS  
CASE FOR FAILURE TO REMIT PLAN PAYMENTS**

Olivera Bevanda certifies as follows:

1. I am the Debtor in this Chapter 13 case. I have knowledge of the facts set forth in this Certification.
2. Under the Order Confirming Plan that was entered on December 3, 2019 (Doc. No. 22), I am required to remit to the Trustee monthly payments of \$350, starting with the month of September, 2019. As of today, I owe four (4) monthly payments, totaling \$1,400.
3. On January 13, 2020, the Chapter 13 Standing Trustee filed a motion to dismiss my case, for non-payment of the payments due under the confirmed Plan. I or my husband will pay the \$1,400 that is now due by not later than the return date of the Trustee's motion.
4. Considering the foregoing, I respectfully submit that my Chapter 13 case should not be dismissed.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Olivera Bevanda   
Olivera Bevanda

Dated: February 13, 2020